

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

VIDEO GAMING TECHNOLOGIES,
INC.,

Plaintiff,

vs.

CASTLE HILL STUDIOS LLC, *et al.*

Defendants.

CASE NO. 17-CV-00454-GKF-JFJ

**DEFENDANTS' MOTION TO SEAL MOTION FOR SUMMARY
JUDGMENT AND SUPPORTING DECLARATION**

Pursuant to Local Rule 79.1, and paragraph 2(f) of the Stipulated Protected Order (ECF No. 55) (the "Protective Order"), Defendants Castle Hill Studios LLC, Castle Hill Holdings LLC, and Ironworks Development LLC (together "Castle Hill"), hereby request that the Court enter an order sealing Defendant's unredacted Motion for Summary Judgment and the Supporting Declaration (collectively, ECF Nos. 184 – 187). In support of this request to seal, Defendants state as follows:

1. Portions of the Motion for Summary Judgment contain information designated by Plaintiff or Defendants as Confidential or Highly Confidential Information pursuant to paragraph 2(c) of the Stipulated Protective Order (ECF No. 55).

2. **Exhibits 1-3, 6, 9-18, 27, 32, 37-39, 42, 51-52, 55-56, 59, 70-72, 84, and 87** to the Declaration consist of excerpts of depositions, portions of which were designated as Confidential or Highly Confidential pursuant to the Stipulated Protective Order.

3. **Exhibits 4-5, 7, 33, 45-47, 49-50, 53-54, 57, 63-69, 75-81, 83, 85-86, and 88-92** to the Declaration consist of documents produced in discovery and, in some cases, marked as exhibits at depositions. All of these documents were designated as either Confidential or Highly Confidential pursuant to the Stipulated Protective Order.

4. **Exhibits 8, 74, and 82** to the Declaration consist of written discovery responses, which were designated as containing Confidential or Highly Confidential information pursuant to the Stipulated Protective Order.

5. Pursuant to Local Rule 79.1, General Order 08-11, and the Protective Order, Castle Hill filed both a public, redacted Motion with public, redacted versions of all exhibits, and a sealed, unredacted Opposition, with sealed, unredacted versions of all exhibits described herein.

WHEREFORE, Defendants respectfully request that the Court enter an Order sealing the Motion for Summary Judgment and exhibits to Declaration as set forth herein.

Dated: October 12, 2018

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of October, 2018, I caused a copy of the foregoing **DEFENDANTS' MOTION TO SEAL MOTION TO EXCLUDE PLAINTIFF'S EXPERT YORAM WIND AND SUPPORTING DECLARATION** to be filed using the Court's ECF system, which will provide electronic notification of filing to the following counsel for Plaintiff:

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